

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*  
Plaintiffs,

v.

Civ. Action No.: 14-cv-00029-AB

National Football League and  
NFL Properties, LLC,  
successor-in-interest to  
NFL Properties, Inc.,  
Defendants.

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**STIPULATION AND [PROPOSED] ORDER<sup>1</sup>**

This Stipulation and Agreement, dated August [7<sup>th</sup>], 2017, is made and entered into by and among the National Football League and NFL Properties LLC (the "NFL Parties"), and Class Counsel (collectively, the "Parties").

WHEREAS, on April 22, 2015, this Court issued a Memorandum (ECF No. 6509) and Final Order and Judgment (ECF No. 6510), and on May 8, 2015, an amended Final Order and Judgment (ECF No. 6534), approving the Settlement Agreement in its entirety;

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<sup>1</sup> Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.


WHEREAS, on May 4, 2015, Claims Administrator BrownGreer PLC, in accordance with the Final Order and Judgment and the Settlement Agreement, filed the list of Opt Outs who timely submitted proper requests to opt out in compliance with Section 14.2(a) of the Settlement Agreement, including Retired NFL Football Players Billy Ray Barnes, Alge Crumpler, Carlester Crumpler, David Merritt Sr. and Darryl Oliver (ECF No. 6533);

WHEREAS, Billy Ray Barnes, Alge Crumpler, Carlester Crumpler, David Merritt Sr. and Darryl Oliver have since submitted written requests seeking to revoke their Opt Out requests (*see* Exhibit 1 (Declaration of Orran L. Brown, Sr.));

WHEREAS, the Parties have agreed to accept the revocation requests submitted by Billy Ray Barnes, Alge Crumpler, Carlester Crumpler, David Merritt Sr. and Darryl Oliver, subject to Court approval, because they submitted the requests before the deadline to register for the Class Action Settlement program;

**AND NOW**, this [7<sup>th</sup>] day of August, 2017, it is hereby stipulated and agreed by the Parties that the revocation requests submitted by Billy Ray Barnes, Alge Crumpler, Carlester Crumpler, David Merritt Sr. and Darryl Oliver are accepted, subject to Court approval, because they submitted the requests before the deadline to register for the Class Action Settlement program.

It is so **STIPULATED AND AGREED**,

By: 

Date: August 7, 2017

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*Class Counsel*

By: Brad S. Karp 

Date: August 7, 2017

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*Counsel for the NFL Parties*

It is so **ORDERED**, based on the above Stipulation and the accompanying Declaration of Orran L. Brown, Sr., that the revocation requests submitted by Billy Ray Barnes, Alge Crumpler, Carlester Crumpler, David Merritt Sr. and Darryl Oliver are approved and the Claims Administrator is **DIRECTED** to post a revised list of Opt Outs forthwith excluding Billy Ray Barnes, Alge Crumpler, Carlester Crumpler, David Merritt Sr. and Darryl Oliver.

\_\_\_\_\_  
ANITA B. BRODY, J.

Copies **VIA ECF** on \_\_\_\_\_ to:

Copies **MAILED** on \_\_\_\_\_ to: